

DOCKET FILE COPY DUPLICATE

BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

In Re the Matter of:

DAVID I. TITUS.

Amateur Radio Operator and Licensee of
Amateur Radio Station KB7ILD.

EB Docket No. 07-13
FRN No. 0002074797
File No. EB-06-IH-5048

DAVID TITUS' RESPONSE AND GENERAL
OBJECTIONS TO THE BUREAU'S FIRST
INTERROGATORIES, AND REQUEST FOR
ADDITIONAL TIME IN WHICH TO
ANSWER AND OBJECT

David Titus responds to the Enforcement Bureau's First Interrogatories dated March
9, 2007 but only received March 19, 2007 as follows:

Request for Additional Time to Answer

As these interrogatories were only received by David Titus and his attorneys on
March 19, 2007, Mr. Titus respectfully requests that he be given leave to file his answers and
specific objections to interrogatories on or before April 2, 2007

In order to protect his rights in the event his request is not granted, Mr. Titus sets
forth the following general objections to the interrogatories

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TO THE BUREAU'S FIRST INTERROGATORIES, AND
REQUEST FOR ADDITIONAL TIME IN WHICH TO
ANSWER AND OBJECT

Law Office
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General Objections

1. Mr. Titus objects to the definition of the terms “relate to” and “relating to” contained in the Instructions insofar as they purport to mean that these interrogatories seek information which is protected from discovery under the attorney-client privilege and work product doctrine, as well as information which is not reasonably calculated to lead to the discovery of relevant or admissible evidence.
2. Mr. Titus objects to these interrogatories insofar as they request information which is confidential and sensitive. Mr. Titus offers to enter into a mutually agreed upon protective order that will allow such information to be produced in a manner which respects their confidentiality.
3. Mr. Titus objects to the purported response date for these interrogatories because the Bureau fails to take into account the fact that these requests (i) were mailed; (ii) were mailed to Mr. Titus as opposed to his attorneys of record; (iii) were not delivered to Mr. Titus; and (iv) were only received by Mr. Titus’ attorneys on March 19, 2007. Mr. Titus is responding as soon as is possible under the circumstances.
4. Mr. Titus objects to these interrogatories insofar as they are unduly burdensome and designed merely to harass or burden him into spending undue time and expense in answering them. It appears that the Enforcement Bureau is using its discovery as a mechanism to shift the burden of proof it bears onto Mr. Titus, and to buttress after the fact its conclusory and thinly supported request for an order show cause.
5. Each and every one of Mr. ‘Titus’ answers will be made without waiver of, and subject to, these General Objections, and as if these General Objections has been restated therein.


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1 DATED this 20th day of March, 2007.

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3 DAVID S. MARSHALL, WSBA #11716
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5 Attorneys for David L. Titus
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